



THE CITY OF NEW YORK
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November 14, 2022

BY E.C.F.

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

11/14/22 
John G. Koeltl, U.S.D.J.

Re: Jamel Purnell v. Williams, et al.,
22-CV-5956 (JGK)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendant City of New York ("City") in the above referenced matter.¹ At this time, I write respectfully, in response to the Court Order dated October 31, 2022, directing the parties to file a Fed. R. Civ. P. 26(f) Report by November 14, 2022. (See ECF No. 13). For the reasons below, defendant requests an eleven-day (11) extension of time until November 25, 2022.

Plaintiff is currently incarcerated and this Office has not had an opportunity to confer with plaintiff as required by Rule 26(f). This Office is in the process of contacting the Department of Correction in order to confer with plaintiff and submit the Rule 26(f) Report. Further, this Office intends to respond the Court Order dated September 22, 2022, directing it to respond to the Valentin Order on November 25, 2022. (See ECF No. 11). At present, the City is the only named defendant in this suit, and it is unlikely that this Office and plaintiff will be able to effectively confer regarding discovery until the Valentin response has been conveyed to plaintiff.

¹ This case has been assigned to Assistant Corporation Counsel Jesse Zilinski, who is pending admission to the New York State Bar. Mr. Zilinski is handling this matter under supervision and may be reached at (212) 356-2381 or jzilinsk@law.nyc.gov.

Accordingly, this Office respectfully request an enlargement of time of eleven (11) days from November 14, 2022 to November 25, 2022 in order to confer with plaintiff and provide him with the Valentin response.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Joseph Zangrilli
Joseph Zangrilli
Senior Counsel
Special Federal Litigation Division

cc: **BY REGULAR MAIL**
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